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15 *Attorneys for Debtors and Debtors in Possession*

16 **UNITED STATES BANKRUPTCY COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 **In re:**

20 **PG&E CORPORATION,**

21 **- and -**

22 **PACIFIC GAS AND ELECTRIC
COMPANY,**

23 **Debtors.**

24 Affects PG&E Corporation
25 Affects Pacific Gas and Electric Company
26 Affects both Debtors

27 **All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

28 **STIPULATION BETWEEN DEBTORS
AND DAN CLARKE TO CONTINUE
HEARING ON MOTION FOR RELIEF
FROM AUTOMATIC STAY**

Re: Dkt. Nos. 2823

[No Hearing Requested]

This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”), on the one hand, and Dan Clarke (“**Clarke**”), on the other. The Debtors and Clarke are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On June 19, 2019, Clarke filed the *Motion for Relief from the Automatic Stay* [Dkt. No. 2823] (the “**Motion**”) which is currently set for a hearing at 9:30 a.m. on July 24, 2019 (the “**Hearing**”). Any response or opposition to the Motion by the Debtors or either official committee appointed in this case is due by 4:00 p.m. (Pacific Time) on July 19, 2019.

B. The Parties have agreed, subject to formal documentation, to a resolution of the Motion by allowing Clarke limited relief from the automatic stay.

C. The Parties' respective counsel have agreed that the Hearing be continued to the omnibus hearing scheduled for 9:30 a.m. on July 31, 2019, so that the Parties may prepare a formal stipulation and proposed order granting Clarke limited relief from the automatic stay.

NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND
BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES
JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. The Hearing on the Motion is continued to 9:30 a.m. (Pacific Time) on July 31, 2019.

2. The time for the Debtors and the official appointed committees to respond to the Motion shall be extended to 4:00 p.m. (Pacific Time) on July 26, 2019.

[Signatures on next page]

1 Dated: July 18, 2019

2 WEIL, GOTSHAL & MANGES LLP
3 KELLER & BENVENUTTI LLP

4 */s/ Peter J. Benvenutti*
5 Peter J. Benvenutti

6 *Attorneys for Debtors
and Debtors in Possession*

Dated: July 18, 2019

BELVEDERE LEGAL PC

5 */s/ Matthew D. Metzger*
6 Matthew D. Metzger

7 *Attorneys for Dan Clarke*